

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

BEAR MARTINSON and MEGAN  
MARTINSON, husband and wife and the  
marital community comprised thereof,

Plaintiffs,

v.

PROGRESSIVE CASUALTY INSURANCE  
COMPANY, a foreign insurance company

Defendant.

No. 2:24-cv-01345-JCC

STIPULATION AND ~~[PROPOSED]~~  
ORDER FOR DISMISSAL WITH  
PREJUDICE OF DEFENDANT  
PROGRESSIVE CASUALTY  
INSURANCE COMPANY

**I. STIPULATION**

IT IS HEREBY STIPULATED by and between the parties hereto that any and all claims and causes of action against defendant Progressive Casualty Insurance Company may be dismissed with prejudice and without an award of costs or fees to any party.

DATED: December 16, 2024.

***Attorneys for Plaintiffs:***

**LAW OFFICES OF SAM ELDER PLLC**

By: s/Samuel J. Elder via email authority  
Samuel J. Elder, Jr., WSBA No. 26085

***Attorneys for Defendant Progressive  
Casualty Insurance Company:***

**JENSEN MORSE BAKER PLLC**

By: s/Steven D. Jensen  
Steven D. Jensen, WSBA No. 26495  
William Christopher Gibson, WSBA

STIPULATION AND ~~[PROPOSED]~~ ORDER FOR  
DISMISSAL WITH PREJUDICE - 1  
Case No. 2:24-cv-01345-JCC

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1 **II. ~~PROPOSED~~ ORDER**

2 Pursuant to the Stipulation above, it is hereby ORDERED that any and all claims and  
 3 causes of action against defendant Progressive Casualty Insurance Company are dismissed with  
 4 prejudice and without an award of costs or fees to any party.  
 5

6  
 7  
 8 DATED: December 17, 2024



9 JOHN C. COUGHENOUR  
 10 United States District Court Judge

11 Presented by:

<p>13 <i>Attorneys for Plaintiffs:</i></p> <p>14 <b>LAW OFFICES OF SAM ELDER PLLC</b></p> <p>15</p> <p>16</p> <p>17 By: <u>s/Samuel J. Elder via e-mail authority</u>          Samuel J. Elder, Jr., WSBA No. 26085          James Prescott, WSBA No. 52685</p> <p>18</p> <p>19 E-Mail: sam@samelderlaw.com          james@samelderlaw.com</p>	<p>13 <i>Attorneys for Defendant Progressive Casualty Insurance Company:</i></p> <p>14 <b>JENSEN MORSE BAKER PLLC</b></p> <p>15</p> <p>16</p> <p>17 By: <u>s/Steven D. Jesen</u>          Steven D. Jensen, WSBA No. 26495          William Christopher Gibson, WSBA          No. 26472</p> <p>18</p> <p>19 E-mail: steve.jensen@jmblawyers.com          chris.gibson@jmblawyers.com</p>
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**CERTIFICATE OF SERVICE**

Pursuant to RCW 9A.72.085, the undersigned certifies, under penalty of perjury under the laws of the United States of America and the State of Washington, that on the 16<sup>th</sup> day of December, 2024, the document attached hereto was delivered to the below counsel in the manner indicated.

*Counsel for Plaintiffs*

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- ☒ Via CM/ECF
- ☒ Via electronic mail
- ☐ Via U.S. Mail, postage prepaid
- ☐ Via Facsimile
- ☐ Via Courier
- ☐ Via Overnight delivery

DATED this 16<sup>th</sup> day of December, 2024, in Kansas City, MO.

By s/Gwendolyn M. Wall  
Gwendolyn M. Wall, paralegal